



**STATE OF NEVADA**  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
Colleen Cripps, Ph.D., Administrator

May 15, 2013

Michael Rojo  
Environmental Services, Supervisor  
NV Energy  
PO Box 279, MS 77  
501 Wally Kay Drive  
Moapa, NV 89025

Re: **NV Energy (NVE)**  
**Reid Gardner Station (RGS)**  
**NDEP Facility ID #H-000530**  
Nevada Division of Environmental Protection Response (NDEP) to:  
*Diesel Remediation System Design Work Plan (DRS Work Plan)*, Prepared by Broadbent,  
Dated: April 19, 2013

Dear Mr. Rojo:

The NDEP has received and reviewed NVE's above-identified document dated April 19, 2013. The subject document contains a description of a proposed diesel remediation system. Please review and address the comments from NDEP included in Attachment A.

NDEP requests the specific comments in Attachment A be addressed regarding the system moving forward and prior to next quarterly meeting. Please contact the undersigned with any questions or comments about this letter at (775) 687-9396 or [aoakley@ndep.nv.gov](mailto:aoakley@ndep.nv.gov)

Sincerely,

Alison Oakley, CEM  
Environmental Scientist III  
Bureau of Corrective Actions  
NDEP-Carson City Office  
Fax: 775-687-8335



ec: Greg Lovato, Bureau of Corrective Actions, NDEP  
Scott Smale, Bureau of Corrective Actions, NDEP  
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cc (with attachment):

William Anderson, Moapa Band of Paiutes, Chairperson, P.O. Box 340, Moapa, NV 89025  
Ian Zabarte, Moapa Band of Paiutes, Environmental Director, P.O. Box 340, Moapa, NV 89025  
Noelle Gentilli, Department of Water Resources, 1416 9<sup>th</sup> Street, Room 1118, Sacramento CA 95814

## ATTACHMENT A

In general, the DRS Work Plan is conceptual and generalized. NDEP understands that NVE wishes to expedite product recovery and offers general comments to support the conceptual design.

### General Comments

1. The DRS Work Plan states: “*the modified dual extraction system is operating reliably and has exhibited an excellent percentage of operational time*”. Operational time is an important consideration; however, reuse of existing equipment should not overlook the overall remedial objective of the system. The DRS Work Plan should include a discussion of the objectives of the system.
2. The *Draft Preliminary Source Area Identification and Characterization Report* (PSAICR), dated November 2012 identified the potential presence of chlorinated solvents in the area of HM-50(R). The DRS Work Plan should address if any potential exists for free product to be contaminated with spent solvents and the potential implications associated with the permit, monitoring (compounds of concern, influent, effluent, etc.), and disposition of the collected product.
3. The Draft PSAICR identified the potential presence of gasoline in the area of HM-50(R). The DRS Work Plan should consider potential implications, if any, associated with co-mingled free product.
4. The “stinger” design for product extraction may result in emulsified product that is less effectively separated in the oil water separator (OWS). This has been a problem for the existing OWS. Further consideration of the extraction method and OWS effectiveness is warranted.
5. NDEP understands that the DRS Work Plan is essentially a conceptual design; however, the following items should be considered as part of the upcoming detailed DRS design:
  - overflow protection for all open top vessels;
  - secondary overflow protection (shut-off switch) for the secondary containment pad;
  - conduit for the product hose proposed in the trench to HM-48 and HM-50R;
  - breakthrough monitoring for the GAC vessels;
  - operations and maintenance (O&M) manual and proposed periodic maintenance schedule; and
  - startup procedures and initial O&M schedule
6. Please include maps showing the historical maximum and current known extent of LNAPL with the proposed extraction well network (see General Comment #1).

7. In addition to the proposed trench and piping that will connect the extraction wells to the treatment system, please include the location existing dual phase well extraction system trench and piping that connects the existing extraction wells to the treatment system on Drawing 1.
8. Please include a description of the planned disposition of the collected product (see General Comments #2 and #3).
9. Please provide the rationale for the proposed use of passive devices for free product recovery in HM-20 and HM-21. Also, please include a figure with these wells in the DRS Work Plan.